

# **FINDING OF NO SIGNIFICANT IMPACT MANAGEMENT OF SNOWMOBILES In ROCKY MOUNTAIN NATIONAL PARK**

Snowmobile use in Rocky Mountain National Park (RMNP) began in the early 1960s. Snowmobile use statistics were first recorded in 1967. In that year, 88 snowmobiles entered the park. During the winter of 1999 – 2000, it is estimated that 28,417 snowmobiles entered the park and 24,773 entered the park during the winter of 2000 – 2001.

Recently snowmobiling in RMNP has been limited to two trails on the park's west side (Colorado River District), near the gateway community of Grand Lake:

- ▶ The North Supply Access Trail receives 87% of total use. This route traverses a 2-mile section of the park along the park boundary, providing access between Grand Lake and 100 miles of snowmobile trails on the adjacent Arapaho National Forest Stillwater Trail System. The North Supply Access Trail does not constitute off-road vehicle use. The first 0.87 mi. (1.4km) of the trail is a utility corridor open to authorized motor vehicles, and the remaining 1.13 mi. (1.8 km) follows County Road 491 (Sun Valley Road) which is open to other motorized vehicles year round.
- ▶ A 16-mile portion of Trail Ridge Road that is part of Colorado State Highway 34 receives 13% of park snowmobile use. Snowmobiles are allowed on the snowpacked road from near the park's west boundary to Milner Pass, at the Continental Divide.

Previously, two other routes were used on the park's west side. The park Superintendent closed these two routes in 1997 under the authority of 36 CFR 1.5. The Bowen Gulch Access Route was closed because it provided direct access to the Never Summer Wilderness area in the Arapaho National Forest, where motorized use is not permitted. The Summerland Park Snowmobile Trail was closed because of trespassing and property damage on adjacent private land. One other congressionally authorized route has never been opened because of potential impacts to the bald eagle, which is a Federally listed threatened species.

On April 26, 2000, the Department of the Interior Assistant Secretary for Fish and Wildlife and Parks directed the National Park Service (NPS) to take a fresh look at snowmobile use and determine whether that use is consistent with the service-wide regulation found in 36 CFR 2.18 (promulgated in 1983), as well as the Executive Orders 11644 (promulgated in 1972) and 11989 (promulgated in 1977). The regulation and the executive orders prohibit snowmobiles except when their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources. In response to the Assistant Secretary's direction, RMNP prepared an Environmental Assessment (EA) for the Management of Snowmobiles.

On December 15, 2000, the EA was released for public review. The EA was available for public review and comment for eighty-four (84) days, which provided an opportunity for public input on the alternatives. A preferred alternative was identified in the EA. RMNP received 3,363 responses in the form of letters, a petition, via facsimiles and e-mail.

On December 20, 2000 Congress passes the Miscellaneous Appropriations Act, 2001 (H.R. 5666). A rider attached to this Act states:

*“None of the funds provided in this or any other Act may be used prior to July 31, 2001 to promulgate or enforce a final rule to reduce during the 2000-2001 or 2001-2002 winter seasons the use of snowmobiles below current use patterns at a unit in the National Park System . . .”*

Based upon the provisions of this Act, RMNP did not analyze the public comments that were received during the public comment period until after July 31, 2001.

#### **Public Response to the Environmental Assessment**

<b>Alternative</b>	<b>Number of Letters Supporting the Alternative</b>	<b>Percentage</b>
1 – (Preferred) North Supply Access Trail only	2,498	74
2 – (No Action) North Supply Access Trail & Trail Ridge Road	697	21
3 – (Less Restrictive) North Supply Access Trail, Trail Ridge Road, Summerland Park Snowmobile Trail & Bowen Gulch Access Route	12	<1
4 – (Most Restrictive) RMNP closed to snowmobiles	156	5
	3,363	100

After a careful review of public comments, resource, economic and visitor impacts, the preferred alternative (Alternative 1) is selected for implementation. The park will continue to allow snowmobile use of the North Supply Access Trail.

The park will no longer allow snowmobile use on three previously designated snowmobile trails (routes), Trail Ridge Road, Summerland Park Snowmobile Trail, and the Bowen Gulch Access Route.

Implementation of the preferred alternative will require the adoption of a special regulation in the Code of Federal Regulations (Title 36, §1.7(b), Section §7.7(e)). The National Park Service is required to go through a rulemaking process, which includes a public comment period, prior to adoption of any new regulation. A notice regarding a Proposed Rule specific to RMNP was published in the Federal Register on January 5, 2001. Written comments from the public were accepted through March 6, 2001, and approximately 3,000 responses were received. Following the approval of this Finding of No Significant Impact (FONSI), a Final Rule must be prepared and reviewed by the agency (National Park Service) and the Department (Department of the Interior), and a notice regarding the Final Rule must be published in the Federal Register. Pending the outcome of the Final Rule, the decision presented in this FONSI, and as presented in the Proposed Rule, could change.

With the implementation of the preferred alternative, the following would occur:

- a. The North Supply Access Trail would be open for snowmobile use. For that portion of the trail that uses the Sun Valley Road, the road would be open for dual use by snowmobiles and automobiles.
- b. Six miles of Trail Ridge Road east of the Timber Lake Trailhead parking lot to Milner Pass would revert to a Backcountry Trail during the winter months when it is closed to all mechanized vehicles.
- c. Trail Ridge Road would be closed to snowmobiles but open to automobiles from the park boundary to the Timber Lake Trailhead parking lot during the winter months.
- d. The two inholders in Summerland Park will be granted permission to access their properties by snowmobiles during the winter months.
- e. Use of the Bowen Gulch Access Route by snowmobiles would no longer be authorized due to U.S. Forest Service wilderness designation adjacent to the park's western boundary.

Reference may be made to the Environmental Assessment for the Management of Snowmobiles in Rocky Mountain National Park, dated June 2002. Comments received during the public review period required some factual changes to the EA that was released on December 15, 2000. The June 2002 EA reflects those changes.

Alternative 1 minimizes environmental impacts to RMNP and the Arapaho National Forest and minimizes economic impacts to the gateway community of Grand Lake. The Grand County Board of County Commissioners, the Town of Grand Lake Trustees and the Arapaho National Forest are not opposed to Alternative 1, which demonstrates a spirit of cooperation between RMNP, the gateway community of Grand Lake and the Arapaho National Forest.

RMNP is not considered a main destination for snowmobiles, but the North Supply Access Trail (2 miles/3.2 km) crosses the park and provides access to about 100 miles (160 km) of snowmobile trails within the Arapaho National Forest. Concerns identified during scoping and public review, and evaluated in the EA, include impacts to soils and vegetation, natural soundscape and night sky, aquatic, wetland, riparian communities and floodplains, endangered, threatened and rare species, wildlife, wilderness, air quality, socioeconomic resources, visitor use, public enjoyment, state tribal and federal authority, park programs and budget, and historic and prehistoric resources.

### **PREFERRED ALTERNATIVE (ALTERNATIVE 1)**

The North Supply Access Trail will remain open to snowmobiles to provide access to National Forest lands west of the park, principally to about 100 miles (160 km) of trails in the Stillwater Trail System of the Arapaho National Forest. Trail Ridge Road would be permanently closed to snowmobiles. The Summerland Park Snowmobile Trail and Bowen Gulch Access Route that were previously closed would remain closed.

### **ENVIRONMENTALLY PREFERRED ALTERNATIVE (ALTERNATIVE 1)**

The environmentally preferred alternative should be the one with the least impact to the "human environment" irrespective of land ownership. Section 1508.7 of the Council on Environmental Quality (CEQ) Regulations for Implementing the National Environmental Policy Act (NEPA) state that cumulative impacts are to be evaluated regardless of what other agencies (Federal or non-

Federal) or persons might be involved. The National Park Service is required to consider the “absolute” impact the resource is experiencing, whether those impacts occur on private or public land.

In this case, the environmentally preferred alternative is the same as the preferred alternative (Alternative 1). Alternative 1 is a balance between minimizing environmental impacts from snowmobile use in the interior of the park and the adjacent Arapaho National Forest, and minimizing economic impacts to the Town of Grand Lake. After careful review, leaving the two-mile North Supply Access Trail open to snowmobiles will not have any significant environmental impacts to the park or the Arapaho National Forest that were identified during scoping, planning and public review, and will not have any significant adverse economic impacts to the Town of Grand Lake. The preferred alternative confines environmental impacts from snowmobiles to a small area within the park (less than 1% of the entire park area). As discussed below, these impacts would not impair park resources or values.

The other alternatives discussed below had varying degrees of impacts to either the park, Arapaho National Forest or the town of Grand Lake.

#### **OTHER ALTERNATIVES CONSIDERED IN THE EA AND RECOMMENDED DURING THE PUBLIC REVIEW**

**Alternative 2 (No Action)** – The North Supply Access Trail and Trail Ridge Road from the Kawuneeche Visitor Center to Milner Pass would remain open to snowmobiles. Snowmobile access to Trail Ridge Road from the North Supply Access Trail would follow Sun Valley Road to the Kawuneeche Visitor Center. Trail Ridge Road would be maintained as in the past from the Kawuneeche Visitor Center to the Timber Creek Trailhead parking lot. This portion of Trail Ridge Road would serve as a dual use road for snowmobiles and automobiles and be maintained with 3 in. (8 cm.) of packed snow. Six miles (9.6 km) of Trail Ridge Road from the Timber Creek Trailhead parking lot to Milner Pass would be groomed and open to snowmobiles, but closed to automobiles during the winter. The Summerland Park Snowmobile Trail and the Bowen Gulch Access Route would remain closed and changes in 36 CFR §7.7(e) would permanently close these two trails.

This alternative would benefit snowmobile and retail businesses in Grand Lake, but have a moderate adverse impact on water, soil, wildlife, air and vegetation resources within the interior of RMNP. Snowmobile impacts to natural resources would occur 16 miles (25.6 km) into the interior of the park and would have a direct impact on the natural soundscape and air quality, and potential indirect and cumulative impacts to soil and vegetation, aquatic, wetland and riparian communities, wildlife, and threatened species. One federally listed species (lynx) and one candidate species (wolverine) are believed to have been extirpated from the park, but may be reintroduced in the future. Leaving Trail Ridge Road open to snowmobiles would have a negative impact on potential lynx and wolverine habitat, potential black bear den habitat, and bighorn sheep winter habitat in the Milner Pass area. This alternative would have a moderate adverse impact on the natural soundscape and air quality within recommended wilderness inside the boundaries of RMNP, but have no impact to the designated Never Summer Wilderness in the Arapaho National Forest.

**Alternative 3 (Less Restrictive)** -- The North Supply Access Trail and Trail Ridge Road from the Kawuneeche Visitor Center to Milner Pass would remain open to snowmobiles. Snowmobile access to Trail Ridge Road from the North Supply Access Trail would follow Sun Valley Road to the

Kawuneeche Visitor Center. Trail Ridge Road would be maintained as in the past from the Kawuneeche Visitor Center to the Timber Creek Trailhead parking lot. This portion of Trail Ridge Road would serve as a dual use road for snowmobiles and automobiles and would be maintained with 3 in. (8 cm.) of packed snow. The Summerland Park Snowmobile Trail and the Bowen Gulch Access Route would be reopened. The current wording in 36 CFR §7.7(e) would remain and the superintendent's compendium would be changed to allow snowmobiles on these two trails.

This alternative would benefit snowmobile and retail businesses in Grand Lake, but have a moderate adverse impact on resources within RMNP and in designated wilderness in the Arapaho National Forest. Snowmobiles would impact natural resources 16 miles into the interior of RMNP and would have a direct impact on the natural soundscape and air quality, and potential indirect and cumulative impacts to soil and vegetation, aquatic wetland and riparian communities, wildlife, and threatened species (potential habitat for lynx and wolverine). Impacts from snowmobile use would occur in the Summerland Park and Bowen Gulch areas, and prior experience has shown that nearby private landowners could also be adversely impacted. This alternative would have a moderate adverse impact on the natural soundscape and air quality within recommended wilderness well inside the boundaries of RMNP and to a portion of the designated Never Summer Wilderness in the Arapaho National Forest.

**Alternative 4 (Most Restrictive)** – RMNP would be permanently closed to snowmobiles. This alternative would be a benefit to the resources within RMNP and to visitors who do not use snowmobiles, but have a significant adverse economic impact to Grand Lake and have a moderate adverse impact to natural resources in the Arapaho National Forest particularly along County Road 4 and in the Idleglen parking area. Because the North Supply Access Trail through the park would no longer be available to provide access to the Stillwater Trail System in the Arapaho National Forest, use of County Road 4 and the Idleglen parking area would increase.

#### **OTHER ALTERNATIVES CONSIDERED DURING THE PLANNING PROCESS BUT REJECTED FOR CONSIDERATION IN THE EA**

There was one alternative considered but excluded from further consideration during the planning process. This alternative would have permitted snowmobile use in the following areas:

- ▶ North Supply Access Trail
- ▶ Trail Ridge Road from the Kawuneeche Visitor Center to the Alpine Visitor Center (20 miles)
- ▶ Summerland Park Snowmobile Trail
- ▶ Bowen Gulch Access Route
- ▶ East Shore Access Trail

The East Shore Access Trail would be a newly established trail that would follow along the east shore of Shadow Mountain Lake to connect with the Arapaho National Recreation Area. The East Shore access trail was considered in an EA in 1981 and rejected because of environmental impacts to bald eagles in an area that is critical bald eagle habitat. Extending snowmobile use on Trail Ridge Road from Milner Pass to the Alpine Visitor Center was also considered in 1981 and rejected because of potential impacts to sensitive alpine tundra and public safety concerns about snowmobile use in a remote area of the park. The safety concerns and potential impacts to natural resources were still valid when the EA for the Management of Snowmobiles in RMNP was released for public review in December 2000. Therefore, opening the East Shore Access

Trail and extending the snowmobile route to the Alpine Visitor Center on Trail Ridge Road were rejected from further consideration.

## MONITORING

Selecting the preferred alternative and the signing of the FONSI does not signal the end of the NEPA process for the management of snowmobiles in RMNP. Assumptions are being made in the EA and the FONSI that the implementation of the Preferred Alternative (Alternative 1) will not have a significant effect on the “human environment.” Since snowmobiles will continue to use the North Supply Access Trail, only continued monitoring can validate if no significant impact is occurring to park resources or the “human environment.” Monitoring is also important in verifying predictions of impact and the effectiveness of mitigating measures. The NPS is responsible for making sure that impacts are no greater than what the EA and FONSI say.

RMNP is finalizing a monitoring plan that will be implemented thirty (30) days after the Final Rule takes effect. It is anticipated that the Final Rule will be in effect for the 2003-2004 snowmobile season. All resource components identified in the table below will be monitored. If initial monitoring indicates that a resource component is well below the threshold level, monitoring intensity may be scaled back. If monitoring indicates that a resource component is close to the threshold level, monitoring may occur annually. If the threshold for a resource component is exceeded or is in danger of being exceeded, management actions will be implemented. Management actions could include limiting the number of snowmobiles using the North Supply Access Trail. The following table identifies the monitoring thresholds, methods, and management actions that will be initiated along the North Supply Access Trail:

**Monitoring Program for Snowmobile Use at Rocky Mountain National Park**

<b>Resource Component</b>	<b>Indicator</b>	<b>Threshold</b>	<b>Method</b>	<b>Monitoring Intensity</b>	<b>Management Actions (if Standard is exceeded)</b>
<b>Air Quality (Public Health)</b>	Visitors and park employee exposure to Carbon Monoxide, Particulate Matter (2.5)	Federal and State air quality standards: CO = 8-hour avg. 9ppm <sup>1</sup> 1-hour avg. 35ppm <sup>1</sup> PM <sub>2.5</sub> = AAM 15µg/m <sup>3</sup> 24 hour 65µg/m <sup>3</sup>	Fixed site and/or portable calibrated sampling of particulate matter (PM <sub>2.5</sub> ) and Carbon Monoxide	2003-2004 season, after which monitoring will be done annually unless initial results are well below threshold levels. In that event, monitoring will be done every five (5) years.	<ul style="list-style-type: none"> <li>- Limit snowmobile numbers.</li> <li>- Require new technological devices or fuel alternatives.</li> <li>- Require spacing between snowmobiles</li> </ul>
<b>Water Quality/ (Snowpack)</b>	Surface water sampling of Ammonia, Sulfate, Nitrate	Federal and State water quality standards Ammonia = 0.02 mg/l Sulfate= 250 mg/l Nitrate= 10 mg/l	Spring runoff, surface water sampling or snowpack sampling	2003-2004 season, after which monitoring will be done annually unless initial results are well below threshold levels. In that event, monitoring will be done every five (5) years.	<ul style="list-style-type: none"> <li>- Limit snowmobile numbers.</li> <li>- Require new technological devices or fuel alternatives</li> <li>- Install drainage improvements</li> </ul>

Sound	Distance and time human-caused sound is audible	NPS snowmobile noise regulation, which is 78 decibels measured on the A-weighted scale measured at 50 feet  CFR 36 (1)(2.18)(1) or other applicable regulations.	Fixed site sampling or portable calibrated decibel reading devices	2003-2004 season, after which monitoring will be done annually	<ul style="list-style-type: none"> <li>- Reduce speed limits</li> <li>- Require new acceptable technological devices</li> <li>- Limit snowmobile numbers</li> <li>- Law Enforcement</li> </ul>
Safety	Oversnow accidents and Conflicts between motorized and non-motorized use	Snowmobile incidents involving property damage or personal injury consistent with current rate and same percentage of additional snowmobiles	Law enforcement patrols and incident reports	Daily to weekly law enforcement patrols and review of incident reports	<ul style="list-style-type: none"> <li>- Sign and reduce speed limits in areas of recurring incidents</li> <li>- Increase law enforcement in areas of concern, review monthly</li> <li>- Require spacing between snowmobiles</li> </ul>
Wildlife	Wildlife harassment or mortality caused by snowmobiles	No incidents of harassment or mortality	Law Enforcement patrols and incident reports	Daily to weekly law enforcement patrols and review of incident reports	<ul style="list-style-type: none"> <li>- Sign and reduce speed limits in areas of recurring incidents</li> <li>- Improve fencing along the North Supply Access Trail</li> </ul>
Visitor Experience	Visitor satisfaction levels with opportunities to experience park values, clean air and solitude.	Visitors are highly satisfied (+90%) with their park experience	Visitor survey	2003-2004 season, after which visitor surveys will be done annually unless initial results are well below threshold levels. In that event, surveys will be conducted every five (5) years.	<ul style="list-style-type: none"> <li>- Separate conflicting uses either temporally or geographically.</li> </ul>

<sup>1</sup> National Ambient Air Quality Standards: Not to exceed more than once per year.

<sup>2</sup> Occupational Safety and Health Administration Permissible Exposure Limit: Time -Weighted 8-hour average; Short-term Limits are 15-minute averages.

## WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

### *Impacts that may be both beneficial and adverse*

There will be a net benefit to environmental resources in the interior of the park with the removal of snowmobile use from a 16-mile portion of Trail Ridge Road. The six-mile segment of road from the Timber Lake Trailhead parking lot to Milner Pass (now open to snowmobiles) will be closed to all mechanized vehicles during the winter. This segment of road will revert to a Backcountry Trail (as defined in the 2001 Backcountry/Wilderness Management Plan) and will be accessible to visitors who cross-country ski or snowshoe. Trail Ridge Road will remain open to automobiles from the west boundary of the park to the Timber Lake Trailhead (approximately 10 miles).

Presently Trail Ridge Road is closed during the winter to all mechanized vehicles from Milner Pass to Many Parks Curve (~17 miles). By implementing the preferred alternative, about 23 miles of road will be closed during the winter. Eliminating snowmobiles and their associated impacts, particularly noise, along the six miles of road from the Timber Lake Trailhead to Milner Pass will be a benefit to bighorn sheep wintering habitat, black bear den habitat, and potential

lynx and wolverine habitat. For park visitors who cross-country ski or snowshoe, the elimination of snowmobiles from this area of the park will enhance their recreational experience by providing an area of natural quiet.

Elimination of snowmobile use on Trail Ridge Road will affect snowmobile rental, repair and related businesses in Grand Lake. A private contractor, Research Triangle Institute (RTI) completed an economic impact analysis of the preferred alternative in November 2000. RTI examined three scenarios to help determine economic losses to Grand Lake. The three scenarios postulated that some visitors wanting to rent snowmobiles so they can ride on Trail Ridge Road will no longer rent a snowmobile in Grand Lake. RTI analyzed what would happen if 5,190 visitors, 3,969 visitors, or 1,527 visitors did not rent a snowmobile. RTI reached its conclusions based on the three scenarios:

#### **Total impacts on value of output for Grand Lake**

	<b>Scenario 1 (loss of 5,190 visitors)</b>	<b>Scenario 2 (loss of 3,969 visitors)</b>	<b>Scenario 3 (loss of 1,527 visitors)</b>
Direct effect	-\$576,400	-\$454,400	-\$210,300
Indirect effect	-82,000	-64,600	-29,800
Induced effect	-70,000	-55,600	-25,700
<b>Total impact</b>	<b>-\$728,400</b>	<b>-\$574,600</b>	<b>-\$265,800</b>

These effects included all sectors of the Grand Lake economy, including snowmobile sales, rental, service and parts, lodging, restaurants, retail sales, etc.

The 1999 – 2000 total winter revenue for all six snowmobile rental companies from snowmobile rentals, service, sales and parts was calculated to be \$1,797,240. The effect on just the snowmobile rental firms is shown in the following table:

<b>Change in Revenues for Snowmobile Rental Firms from Trail Ridge Road being closed to Snowmobiles</b>	<b>Total Lost Revenue</b>	<b>Percentage of Estimated Total 1999-2000 Winter Revenue</b>
Scenario 1 (100 percent reduction in rentals due to visitors no longer being able to ride on Trail Ridge Road)	\$398,885	22%
Scenario 2 (80 percent reduction in rentals due to visitors no longer being able to ride on Trail Ridge Road)	\$319,108	18%
Scenario 3 (40 percent reduction in rentals due to visitors no longer being able to ride on Trail Ridge Road)	\$159,554	9%

Park staff believes the percent reduction in rentals due to Trail Ridge Road being closed to snowmobiles will probably be closer to Scenario 3 than Scenario's 1 and 2. Therefore the range of losses that are anticipated is expected to have a minor economic impact on Grand Lake.

With the closure of Trail Ridge Road, use of the North Supply Access Trail and the Stillwater Trail System is expected to increase. The USFS believes that an increase in snowmobile use along the North Supply Access Trail and the Stillwater Trail System will have a direct impact to user safety and experience, and potential indirect and cumulative impacts on soil and vegetation, air quality, noise, aquatic wetland and riparian communities, wildlife and potential lynx and wolverine habitat on the Arapaho National Forest. The impacts on the Arapaho National Forest from increased snowmobile use are difficult to quantify because the USFS does not know the total number of snowmobiles that enter the Stillwater Trail System. A snowmobile counter was placed near the Idleglen parking area that collected data for five years. Approximately 24,000 snowmobiles were counted during the winter of 1999 - 2000. RMNP has information on the number of snowmobiles that used the North Supply Access Trail and estimated that 24,117 snowmobiles passed through the park in 1999 - 2000. The total number of snowmobiles that used the Stillwater Trail System in 1999-2000 could have been as high as 48,000. If under the worst case scenario all snowmobile use on Trail Ridge Road (an average of 4,690) shifted to the North Supply Access Trail and the Stillwater Trail System, there would be about a nine-percent (9%) increase in use. As stated in the economic impact analysis completed by RTI, it is expected that some snowmobile users that wanted to rent a snowmobile and travel along Trail Ridge Road will no longer do so and not access the Stillwater Trail System. The range of expected increases in snowmobile use on the North Supply Access Trail and the Stillwater Trail System because of the snowmobile closure on Trail Ridge Road is expected to have a minor impact on the Arapaho National Forest.

Permanently closing the Bowen Gulch Access Route will have a beneficial effect on designated wilderness in the Arapaho National Forest and recommended and potential wilderness in RMNP.

In summary:

- ▶ Confining snowmobiles to a small corner of RMNP will benefit natural resources and the experience of visitors on Trail Ridge Road who do not use snowmobiles (i.e., reductions in noise, air pollution and visible haze, and reduced impacts to wildlife, vegetation, soils and wetlands).
- ▶ Snowmobiles will have a minor impact on less than one percent (1%) of the park along the North Supply Access Trail. Greater than 99% of RMNP will be protected from impacts caused by snowmobiles.
- ▶ Closing Trail Ridge Road to snowmobiles is expected to have a minor negative economic impact to Grand Lake.
- ▶ There may be a negligible to minor impact to the Arapaho National Forest due to increased snowmobile use on the Stillwater Trail System.

No significant adverse effects to natural, cultural or socioeconomic resources were identified for the preferred alternative. Impacts of other alternatives varied and are described in the EA.

*Degree of effect on public health or safety*

Closing Trail Ridge Road to snowmobiles, which may shift more snowmobile traffic onto the North Supply Access Trail, should not compromise visitor safety. Statistically, additional snowmobile use on the North Supply Access Trail and the Stillwater Trail System under the worst case scenario is estimated to lead to one (1) additional accident every four (4) years. There have been recorded accidents between snowmobiles and automobiles on Trail Ridge Road. Closing the ten-miles of Trail Ridge Road to snowmobiles where it is a dual use road shared with automobiles will eliminate the potential for snowmobile-automobile accidents along that section of road and will benefit public health and safety. Keeping Trail Ridge Road plowed with 3-inches of snow on its surface will be a benefit to public health and safety. The snow packed road will force automobiles to slow down and reduce the risk of an accident on icy roads. Closing Trail Ridge Road to snowmobiles will eliminate air quality concerns and associated impacts to public health in the interior of the park.

*Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas*

As described in the EA, no significant effects to natural or cultural resources were identified for the preferred alternative. There are no prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas that will be adversely affected from implementing the preferred alternative. The critical bald eagle winter roosting and feeding habitat will be protected. Wetlands in Kawuneeche Valley adjacent to Trail Ridge Road will be protected. Closing the Bowen Gulch Access Route will eliminate potential impacts to the Never Summer Wilderness. Closing Trail Ridge Road to all mechanized vehicles above the Timber Lake Trailhead parking lot will protect bighorn sheep winter habitat, potential bear den habitat and potential lynx and wolverine habitat. That this action will occur within a national park does not, in this circumstance, elevate insignificant impacts to a level of significance requiring a more detailed Environmental Impact Statement (EIS).

*Degree to which effects on the quality of the human environment are likely to be highly controversial*

Snowmobile use in national parks and the development of management plans and environmental assessments (or in the case of Yellowstone National Park an EIS) have generated national and local interest. On December 15, 2000, an EA for the Management of Snowmobiles in Rocky Mountain National Park was released for public review. The public comment period ended on March 6, 2001. A total of 3,363 comments were received via letter, fax, e-mail and petition. Although there was some dispute about the magnitude of potential effects, the NPS response to the public comments and the implementation of the preferred alternative (Alternative 1) minimizes environmental impacts to the park, Arapaho National Forest and economic impacts to Grand Lake, and supports the conclusion drawn in the EA that there are no highly controversial effects on the quality of the human environment.

Closing the park to snowmobiles (Alternative 4) may be highly controversial. Choosing Alternative 2 or 3 may also be controversial. The EA, however, adequately disclosed the environmental consequences of such actions. Alternative 1 provides the best balance among all interested parties.

*Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks*

As described in the EA and in this FONSI, the preferred alternative significantly reduces adverse effects of snowmobiles on natural resources in the interior of the park, and minimizes economic impacts to Grand Lake and to natural resources in the Arapaho National Forest. No highly uncertain or unique or unknown risks were identified in the EA or in the public comments.

*Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration*

Implementing the preferred alternative would allow snowmobile use within Rocky Mountain National Park to continue. The North Supply Access Trail would remain open to snowmobile use, while all other routes (including Trail Ridge Road) would no longer be available to snowmobiles. The situation in Rocky Mountain National Park is unique, and the decisions that are made regarding snowmobile management should not influence decisions that are made in other parks. Except as disclosed in the EA and this FONSI, this action will not set a precedent for future actions with significant effects, nor does it represent a decision in principle about any future consideration.

*Whether the action is related to other actions with individually insignificant but cumulatively significant impacts*

With the closure of Trail Ridge Road to snowmobiles, it is anticipated that some use will shift to the North Supply Access Trail and onto the Stillwater Trail System within the Arapaho National Forest. The worst case scenario would result in 4,690 additional snowmobiles per winter using the Stillwater Trail System. This would represent a nine-percent (9%) increase, which could have a negligible to minor indirect and cumulative impact on soil and vegetation, air quality, aquatic wetland and riparian communities, wildlife, and possible threatened species (lynx) on the Arapaho National Forest. The NPS consulted with the biologist for the Arapaho National Forest, Sulfur Ranger District, and a biologist with the United States Fish and Wildlife Service (FWS) involved with the lynx recovery program in Colorado. Both biologists agree that the increased use of the Stillwater Trail System due to closing Trail Ridge Road to snowmobiles will not result in additional miles of compacted snow trails and therefore have no adverse impact to potential lynx habitat.

These potential cumulative impacts to the Stillwater Trail System are not considered significant. No other cumulative impacts have been identified in the EA or the public comments.

*Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.*

Neither the EA nor the public comments identified potential or actual effects to objects listed in the National Register of Historic Places, or potential or actual destruction of significant scientific, cultural or historical resources from implementation of the preferred alternative.

*Degree to which the action may adversely affect an endangered or threatened species or its critical habitat*

There are presently no known endangered or threatened species or designated critical habitat in the area of the North Supply Access Trail and consequently there would be no negative adverse effect on threatened or endangered species. The Arapaho National Forest and Rocky Mountain National Park have potential lynx habitat, but presently no lynx inhabit the area and are currently considered extirpated from Northern Colorado. The North Supply Access Trail is outside any identified potential lynx habitat and has no impact on key linkage areas identified in the Lynx Conservation Strategy. The portion of the Stillwater Trail System located above 9,000 feet in elevation in spruce/fir forest is within potential lynx habitat. There is a short section of trail (less than one mile) after entering USFS land where snowmobile use is concentrated. This section of trail is below 9,000 feet and is not considered within potential lynx habitat. The trail then splits into a number of other trails, which disperses use in areas that contain potential lynx habitat. The expected increase in snowmobile use because of the closure of Trail Ridge Road to snowmobiles is expected to have a negligible to minor impact on potential lynx habitat on USFS managed land. The biologist for the USFS Sulfur Ranger District and a biologist for the FWS agree that increased use on the Stillwater Trail System will not have an adverse impact on potential lynx habitat. Closing Trail Ridge Road to snowmobiles will enhance potential lynx habitat in the interior of the park if this species is ever reintroduced. Permanently closing the Bowen Gulch Access Trail will enhance potential lynx habitat in the Never Summer Wilderness.

*Whether the action threatens a violation of Federal, state, or local environmental protection law*

The EA and public comments identified no federal, state, or local environmental protection laws that would be violated by the implementation of the preferred alternative.

### *Impairment*

In addition to reviewing the list of significance criteria, the NPS has determined that implementation of the preferred alternative will not constitute an impairment to RMNP's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in *the Environmental Assessment for the Management of Snowmobiles in Rocky Mountain National Park*, the public comments received, relevant scientific studies, and the professional judgement of the decision-maker guided by *NPS Management Policies* (December 27, 2000). Although the preferred alternative will result in continued minor negative impacts along the North Supply Access Trail, in all cases these impacts are the result of actions taken to minimize environmental impacts elsewhere within the park, the Arapaho National Forest and the town of Grand Lake. Snowmobile impacts will be confined to a small corner of RMNP, occur in a utility corridor and a road, and impact less than one percent (<1%) of the park.

The preferred alternative will restore the wilderness experience for park visitors in recommended wilderness 16 miles into the interior of the park, and especially between the Timber Creek Trailhead parking lot and Milner Pass. Wildlife and their habitat will benefit, particularly in the Kawuneeche Valley and above the Timber Lake Trailhead parking lot. Overall, the implementation of the preferred alternative results in benefits to park resources and values, and opportunities for their enjoyment with no impairment.

## **PUBLIC INVOLVEMENT**

The park Superintendent and members of the park staff met with the Grand County Commissioners and the Grand Lake Trustees on May 23, 2000, to inform them about the alternatives being considered for the management of snowmobiles within the national park. Recognizing that the park's preferred alternative allowed for continued snowmobile use along the North Supply Access Trail, the County Commissioners and Grand Lake Trustees did not oppose the preferred alternative.

On December 15, 2000, an EA for the Management of Snowmobiles in Rocky Mountain National Park was released for public review. The public comment period ended on March 6, 2001. A total of 3,363 comments were received via regular mail, fax, e-mail and petition. More than 70% of the letters were received via e-mail. 68% of the responses were "form e-mail" organized by non-governmental organizations. A total of 450 responses (via e-mail, fax, or personal letter) had individual comments, and those comments are addressed in the attached response to substantive comments. A small number of letters were negative and did not offer any constructive comments. About 69% of the letters received came from states other than Colorado. The process of utilizing the Internet for comments appears to have facilitated these letters. About 74% of the 3,363 responses favored Alternative 1, which is the park's preferred alternative. When analyzing 1,041 letters received just from the state of Colorado, 58% favored Alternative 2 (no action), 28% favored Alternative 1, and 13% favored Alternative 4, which is the most restrictive alternative. A total of 222 letters were received from the community of Grand Lake. 82% of the respondents from Grand Lake (183) favored Alternative 2. Thirty-five (35) letters were received from the gateway community of Estes Park. 66% of the respondents from Estes Park (23) favored Alternative 4 (RMNP closed to all snowmobile use).

Some comments expressed by reviewing agencies and the public resulted in minor changes to the text of the EA. All comments warranting an NPS response are addressed in the Response to Substantive Comments attached to this FONSI. The final EA along with the FONSI will be posted on the NPS web site. A post card or e-mail message explaining the final decision and how to locate the final EA and FONSI on the Internet, or how to obtain a photocopy, will be sent to everyone who submitted comments

## **CONCLUSION**

The preferred alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible to minor. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, known cumulative effects or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

The preferred alternative (Alternative 1) and the monitoring plan will be implemented thirty (30) days after the Final Rule is approved. This is expected to occur starting with the 2003-2004 winter season.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended:

Vaughn Baker  
Superintendent

2/18/03  
Date

Approved:

Karen P. Wade  
Intermountain Regional Director

2/20/03  
Date

## **Response to Substantive Public Comments for the Management of Snowmobiles in Rocky Mountain National Park**

Comments received during the 84-day public comment period centered on the following topics: Impacts to soils and vegetation, natural soundscape and night sky, aquatic, wetland, riparian communities and floodplains, endangered, threatened and rare species, wildlife, wilderness, air quality, socioeconomic resources (and in particular economic impacts to the community of Grand Lake), and visitor use.

Some of the following comments resulted in minor changes to the text of the Environmental Assessment (EA). Comments that resulted in a change to the EA are noted.

### **Comments:**

1. *No actions have been taken to prevent or minimize the unnatural snowmobile sounds as NPS-77 guidelines for natural quiet and noise directs.*

We disagree. The preferred alternative eliminates snowmobile noise 16-miles into the interior of the park and concentrates it in a small portion of the park along a two-mile trail that provides access to approved snowmobile trails in the Arapaho National Forest. Noise from snowmobiles will be excluded from over 99% of the park.

2. *EA underestimates the number of accidents. If the number of snowmobiles increase along the North Supply Access Trail, it would be even more dangerous.*

The number of accidents per year disclosed in the EA is based on documented accidents. From the winter of 1995/1996 to the winter of 1999/2000 there were fourteen (14) documented accidents, or an average of about three (3) accidents per year. As stated in the EA, the increase in snowmobile use along the North Supply Access Trail would result in an estimated one (1) additional accident every four (4) years, based on the worst case scenario of 4,690 additional snowmobiles. Eliminating snowmobiles on Trail Ridge Road will eliminate conflicts between snowmobiles and automobiles. On dual use roads like Trail Ridge, there have been documented accidents between automobiles and snowmobiles. Visitor safety will be monitored. If an accident occurs, the park will evaluate the cause of the accident and initiate a management action to improve visitor safety if necessary. If more than four (4) accidents are reported in any given year, the park will initiate the management actions discussed in the monitoring plan.

3. *RMNP has not conducted enough research to verify no impact by snowmobiles to noise, water quality, air quality and soil.*

We did not state there would be no impact to natural resources from snowmobiles if we select the preferred alternative. The preferred alternative will confine impacts from snowmobiles to a small portion of the park along the North Supply Access Trail, but not eliminate impacts. Impacts to natural resources that will occur along the North Access Trail are not considered to be a significant adverse impact, nor will they cause impairment of park resources and values. Over 99% of the park will be protected from adverse impacts caused by snowmobiles.

There has been some monitoring of soil and water along the North Supply Access Trail and further monitoring is planned. RMNP will finalize a monitoring plan, and we anticipate that it will be implemented in the winter of 2003-2004. If a threshold is exceeded, the park will initiate management actions to reduce or eliminate the impact. Impacts to soil and water are presently considered to be minor along the trail.

Other snowmobile impacts to air quality, the natural soundscape and wildlife are based on research conducted in other parks, primarily at Yellowstone National Park. Our decision to implement the preferred alternative is based on choosing the alternative that best minimizes impacts to natural resources within RMNP and the Arapaho National Forest, and minimizes economic impacts to Grand Lake. The preferred alternative has short and long-term beneficial effects on park natural resources and park visitors who do not snowmobile, and is consistent with the act establishing RMNP, and with RMNP's Final Master Plan.

4. *Disagree that elk are rarely observed along Trail Ridge Road.*

The CDOW District Office and RMNP's Colorado River District Ranger's Office both state elk are rarely observed in the Kawuneeche Valley and along Trail Ridge Road during the winter. Elk are very common in the late spring, summer and into the fall when snowmobiles are not used. The Kawuneeche Valley is not considered important elk winter range.

5. *I see no impacts from snowmobiles after the winter is over.*

We disagree. Soil compaction, even though considered to be a minor impact along the North Supply Access Trail, is noticeable. Water and soil chemistry impacts were noted, but considered to be a minor impact. Exposure of Kawuneeche Valley's open meadows when Trail Ridge Road is open to snowmobiles only encourages off-road violations, and violations occur almost every year. There has been documented damage to vegetation from snowmobiles that leave the road corridor, and those impacts are clearly visible after the snow has melted. Small trees have been damaged and killed. Additionally, the adverse experience of other park visitors from the sound, smell, and impaired visibility caused by snowmobiles cannot be resolved by the passage of the winter season.

6. *Trail Ridge Road is a safe place for the elderly and for children who drive or ride on snowmobiles.*

We agree. The decision to close Trail Ridge Road to snowmobiles was not based primarily on safety considerations. However with the closing of Trail Ridge Road, there will still be safe and easy trails for the elderly and children. There are about 40 miles of groomed trails in the Stillwater Trail System and around the town of Grand Lake that are considered suitable trails for the elderly and children (based on personnel communication with several snowmobile rental companies in Grand Lake).

7. *Closing Trail Ridge Road will not provide an opportunity for disabled visitors to use a snowmobile.*

We disagree. Snowmobile trails that are suitable for disabled individuals will still be available in Grand Lake and on trails in the Stillwater Trail System. Disabled individuals will still be able to experience the winter season in RMNP through the use of automobiles.

8. *Since 1996 there has been an effort by the Head Waters Trail Alliance (HTA) to establish a permanent multi-use connection between the Town of Grand Lake and the Stillwater Trail System, other than the North Supply Access Trail. If the North Supply Access Trail was closed to snowmobiles it would preempt funding and activities to gain access on private property.*

We are aware that there has been an effort to find an alternative route, but to date nothing has been resolved. We will continue to support and provide input for any future discussions. If we were to implement Alternative 4 and close the park to snowmobiles, there is no guarantee that an alternative trail would be quickly established. In the interim, there would be significant economic impacts to Grand Lake. The Arapaho National Forest, particularly in the Idleglen Parking area, would experience a significant increase in snowmobile use and significant adverse impacts to natural resources and visitor safety if Alternative 4 were implemented. We chose Alternative 1 because it has the least impact to the “human environment”, which includes the town of Grand Lake, local businesses, nearby private landowners and the Arapaho National Forest. NPS policy states that we are to evaluate impacts irrespective of land ownership. In other words, our analysis of potential impacts did not stop at the park boundary, but included the surrounding area.

9. *Alternative 4 would create additional impacts-such as trespass on private property, impacts on Shadow Mountain Lake and County Road 4 corridor, Idleglen parking area, and economic impacts to Grand Lake.*

We agree, and those impacts were considered in our decision to implement Alternative 1 instead of Alternative 4.

10. *The Barry Memorandum is flawed. It did not follow administrative procedure (i.e. public participation).*

The former Interior Assistant Secretary for Fish and Wildlife and Parks directed the National Park Service to take a fresh look at snowmobile use in national parks and did not dictate what decision a park would make. RMNP followed National Environmental Policy Act (NEPA) guidelines for public participation by developing an EA for the management of snowmobiles. RMNP’s EA has gone through extensive public participation. Additionally, the rulemaking to implement the decision also solicited public comments.

11. *RMNP’s EA interprets the Organic Act too narrowly and ignores the Park’s dual mandate.*

We disagree. The preferred alternative strikes a balance between preservation and protection, and recreational use for public enjoyment. The decision demonstrates a spirit of cooperation between RMNP, Grand Lake, and the Arapaho National Forest.

12. *NPS relies on speculative science that nowhere demonstrates snowmobile use definitely damages resource.*

We disagree. The EA cites numerous peer-reviewed studies conducted on the impacts snowmobiles cause to the natural soundscape, air quality, water quality, aquatic, wetland and riparian communities and wildlife. The vast majority of the research was not done in RMNP, but the research results are pertinent. Within RMNP we have noted snowmobile impacts to vegetation and wildlife, and impacts to water and soil along the North Supply Access Trail. People riding snowmobiles have been observed chasing and harassing moose in the park. It is sometimes a difficult task to protect the resources in the park while providing for recreational opportunities as our enabling legislation dictates. Alternative 1 will continue to provide access for snowmobile users while protecting natural and cultural resources and minimizing snowmobile impacts on other user groups.

13. *NPS rushed – establishes deadline for public comments on draft EA over a month after proposing regulations to implement the preferred alternative.*

The EA was released for public review and comment on December 15, 2000, and was available for public review until March 6, 2001 (84 days). The notice of proposed rulemaking was published in the Federal Register on January 5, 2001 and the public comment period ended on March 6, 2001 (60 days). After preparing this FONSI and the final EA, we will propose a Final Rule to implement the preferred alternative. Pending the outcome of the Final Rule, the decision presented in the FONSI, and as presented in the Proposed Rule, could change. Once rulemaking has been completed, the earliest date the new regulations could take effect is the winter of 2003-2004.

14. *No mention of current or expected technological advancements for snowmobiles.*

Former Assistant Secretary for Fish and Wildlife and Parks best states the answer to this comment. “The snowmobile industry has had years to clean up and quiet down snowmobiles and has failed to do so.... The one thing that the industry is not selling is a clean, quiet introspective and educational means of interpreting the landscape and wildlife wonders of our national parks.” Additionally, neither the manufacturers nor any other respondents submitted useful technological information on new technology to enable us to evaluate whether that technology would lead us to a different conclusion.

15. *Proposed closures don't follow letter and spirit of Section 128 (limiting Federal expenditures on snowmobile closures) and a Memo from President Bush's Chief of Staff – to slow down the rule-making process.*

Section 128 states:

*“None of the funds provided in this or any other Act may be used prior to July 31, 2001 to promulgate or enforce a final rule to reduce during the 2000-2001 or 2001-2002 winter seasons the use of snowmobiles below current use patterns at a unit in the National Park System . . .”*

We have upheld the provisions of this section in its entirety. The EA was released for public comment before this law became effective. Although we received comments before the July 31,

2001 deadline, we did not analyze them or take any other steps to complete this process prior to the expiration of that deadline.

*16. EA is attempting to rush the process before a change in the administration.*

The deadline for public comments was March 6, 2001, after the new administration took office. The park staff took several months to review the 3,363 responses that were received. The preparation of the FONSI has taken almost two years, so the process certainly has not been rushed.

*17. There is a concern that the NRCS will not be able to complete emergency winter repairs on the Snotel Site at Lake Irene, which is currently done by snowmobile. The equipment is heavy, would require a lengthy time period and be overly arduous for employees if snowmobiles cannot be used.*

RMNP has the option to continue to allow the use of snowmobiles within the park for administrative purposes. The NRCS estimates that emergency winter repairs to the Snotel Site occur about once every five years. Since Trail Ridge Road above the Timber Lake Trailhead will revert to a backcountry trail during the winter months, RMNP will evaluate any emergency repair work needed on a case-by-case basis and do a minimum requirement analysis as discussed in the recently approved Backcountry/Wilderness Management Plan. NRCS is not opposed to accessing the site for normal data collection by skis or snowshoes.

*18. Suggest the NPS offer escorted snowmobile trips at certain times or private trips during business hours with the stipulation that the drivers must sign a paper not to speed or get off the road.*

We have no plans for concessionaire or park naturalist guided snowmobile trips. We do offer free snowshoe and cross-country ski interpretative walks lead by park naturalists during weekends in December, January and February. Trail Ridge Road from the park boundary to the Timber Lake Trailhead parking lot will remain open to automobiles. Interpretative walks will occur from various trailheads along the road or from the Kawuneeche Visitor Center, but not from the North Supply Access Trail.

*19. Need to consider economic impacts from any closure.*

The economic impact to Grand Lake was carefully considered in the EA and weighed heavily in our decision to implement our preferred alternative (Alternative 1). A private contractor, Research Triangle Institute (RTI), prepared a report on the economic impact of implementing the preferred alternative (November 2000). A summary of the RTI report is included in the FONSI.

*20. Noise and exhaust seem to extend up-valley for miles.*

With the implementation of the preferred alternative, snowmobile use will be confined to the North Supply Access Trail. All other routes within the park (including Trail Ridge Road) will be closed to snowmobiles. Up-valley noise and exhaust impacts should be eliminated. We will monitor carbon monoxide and particulate matter along the North Supply Access Trail. If a standard is exceeded, we will initiate the appropriate management actions to reduce or eliminate the impact.

21. *Snowmobiles crossing Highway 34 in Grand Lake to access the North Supply Access Trail seems increasingly dangerous.*

We agree. The crossing occurs outside the park and is outside the jurisdiction of the NPS. RMNP recently approved the installation of a warning sign and flashing warning light that will be located inside the park along U.S. Highway 34. The sign and flashing light will warn motorists who are southbound on U.S. Highway 34 about the snowmobile crossing.

22. *What is the mortality and reproductive costs to wildlife from snowmobiles?*

Winter is a harsh time for wildlife. Any type of human disturbance can have an effect on the survivability of an animal. The EA states that all winter recreation activities can have some affect on wildlife behavior and survival (including cross-country skiing and snowshoeing). There have been observations of visitors driving snowmobiles on Trail Ridge Road chasing and harassing moose. There are documented cases in other parks of negative impacts on wildlife from snowmobiles, and those documented cases are pertinent to RMNP. The extent of impacts to wildlife is largely unknown in RMNP. Based on research conducted elsewhere, and observations of snowmobiles chasing moose, we believe there is a minor to moderate impact to wildlife from snowmobiles, particularly above the Timber Lake Trailhead parking lot. The Milner Pass area is bighorn sheep winter habitat, potential bear den habitat, and potential lynx and wolverine habitat. Direct and indirect impacts to wildlife caused by snowmobiles are not the sole reason we chose our preferred alternative, but did weigh in the decision. Additionally, our service-wide regulation prohibits snowmobile use that “disturbs” wildlife. Given the known negative effects on individual animals, we believe the elimination of snowmobiles on Trail Ridge Road is appropriate.

23. *Closing Trail Ridge Road will only result in increased use on the North Supply Access Trail.*

We agree. Under the worst case scenario, based on 1999-2000 snowmobile use, there could be an additional 4,690 snowmobiles per year on the trail. This would represent a 9% increase in use on the North Supply Access Trail and on the Stillwater Trail System. Based on the economic impact analysis conducted by Research Triangle Institute (RTI), it is expected that some snowmobile users that would have rented a snowmobile to ride along Trail Ridge Road will no longer do so. Therefore the actual increase in use is expected to be lower. A maximum 9% increase in snowmobile use along the North Supply Access Trail is not considered to be a significant adverse impact. Our monitoring plan will evaluate whether additional restrictions are necessary to protect park resources and values.

24. *On page 58 of the EA you state snowmobiles “. . . will continue to impact wildlife” which is a contradiction of the April 26, 2000 memorandum prohibiting snowmobiles except when they do not disturb wildlife. RMNP should set a better example and not tolerate any adverse impacts to wildlife.*

The memorandum specifically states,

*“Immediately prohibit such uses whenever it is determined that further off-road vehicle use including snowmobiles will cause, or is causing, considerable adverse effects on soil, vegetation, wildlife, wildlife habitat or cultural or historic resources.”*

Approving and implementing our preferred alternative to leave the North Supply Access Trail open to snowmobiles confines impacts to wildlife to a small portion of the park. The first 0.87 mi. (1.4km) of the trail is a utility corridor open to authorized motor vehicles, and the remaining 1.13 mi. (1.8 km) follows County Road 491 (Sun Valley Road) which is open to other motorized vehicles year-round. The utility corridor is fenced on both sides to prevent snowmobiles from leaving the trail, and sensitive areas along Country Road 491 are also fenced to prevent snowmobiles from leaving the road corridor. Implementing the preferred alternative will not constitute off-road snowmobile use in RMNP. However, Alternatives 2 and 3 would likely result in off-road use. Impacts to wildlife from snowmobile use of the North Supply Access Trail will not cause “considerable adverse effects” to natural resources in the park. The NPS regulatory standard is “disturbed wildlife.” Based on Executive Order 11989, the Barry Memo wanted use to stop immediately if there was “considerable adverse impacts . . . to wildlife.” Our monitoring plan includes a wildlife resource component and we will initiate management actions if there is any wildlife harassment or mortality caused by snowmobile use.

*25. Leaving the North Supply Access Trail open to snowmobiles spreads the use onto the USFS land.*

Leaving the North Supply Access Trail open will continue to provide two means of access to the Arapaho National Forest from the Grand Lake area. If the North Supply Access Trail is closed, only one access to the National Forest would be available from Grand Lake (the Idleglen Trailhead). By keeping the North Supply Access Trail, use of the Stillwater Trail System will be dispersed, with less potential for congestion.

*26. The NPS failed to adequately consider the direct, indirect, and cumulative adverse impacts of snowmobile trails and road grooming on federally listed threatened and endangered species and all globally imperiled species, such as the wolverine. The EA fails to properly evaluate and analyze the considerable evidence documenting the adverse impact of road grooming on park wildlife.*

We disagree. The individual that wrote this letter had other comments, but the letter was clearly directed to Yellowstone National Park and not to RMNP. Comments in the letter about snow coaches do not apply to RMNP since rental companies do not rent snow coaches and there is no concessionaire that offers snow coach rides.

RMNP plows ten miles of Trail Ridge Road, and this section of road is currently a dual use road open to both automobiles and snowmobiles. With implementation of the preferred alternative, the road will remain open to automobiles, but will be closed to snowmobiles. We propose to leave the ten-mile section of road snowpacked. Leaving several inches of snow on the road surface has less impact on water quality, wetlands, and wildlife than plowing the road to pavement because a de-icer would be needed to prevent ice build up on the pavement. Leaving the road snowpacked also slows automobile speed, which is safer for wildlife. The six miles of Trail Ridge Road from the Timber Lake Trailhead parking lot to Milner Pass was never groomed for snowmobile use, and will be closed to snowmobiles. Only two miles of the North Supply Access Trail that passes through the park will remain open to snowmobiles and that section of trail will continue to be groomed. The North Supply Access Trail is not groomed by the NPS but by Trailgroomers Incorporated, which is a volunteer group subsidized by local businesses, the State of Colorado, and by donation jars left at rental companies.

After careful analysis we believe that the North Supply Access Trail is not within potential lynx or wolverine habitat. The trail is less than 9,000 feet elevation, less than one mile from the park boundary and in some places adjacent to year round residences. The FWS has determined that the North Supply Access Trail will have no adverse impact on lynx, bald eagle, any candidate or state listed species. We have no evidence that lynx presently exist in the park, but we want to protect potential habitat. Closing Trail Ridge Road to snowmobiles will enhance lynx and wolverine habitat in the Kawuneeche Valley, and especially east of the Timber Lake Trailhead parking lot to Milner Pass. The North Supply Access Trail, which is adjacent to the park boundary and near residential subdivisions, is not considered important wildlife habitat.

The Stillwater Trail System does fall within potential lynx habitat, but the expected increase in snowmobile use from closing Trail Ridge Road would not be a significant adverse impact.

*27. Concern that the park does not enforce park regulations on snowmobiles.*

Park Rangers enforce 36 CFR 2.18, which is directed toward wildlife protection. They also spend a significant amount of time during the winter patrolling Trail Ridge Road and the North Supply Access Trail. One park ranger position is dedicated solely to snowmobile management during the winter. We vigorously enforce our regulations, not only for snowmobiles but also for any other type of recreation. RMNP park rangers write snowmobile citations during the winter. RMNP Rangers do not patrol the Stillwater Trail system and cannot enforce USFS regulations, but they do assist the USFS and county search and rescue teams when needed for emergencies that occur outside the park. The EA and FONSI will comply with 36 CFR 2.18 and pertinent Executive Orders.

*28. Recommend rigorous air quality and visibility monitoring to assure selected alternative complies with the Clean Air Act.*

We agree and will continue to monitor natural resources and other components along the North Supply Access Trail. As previously discussed, RMNP will develop a monitoring plan with impact thresholds through consultation with the NPS Water Resources Division, Air Quality Division and USGS-BRD scientists.

*29. EA fails to comment on whether snowmobiles in RMNP create a visible haze within the park boundary.*

Because of their two-stroke engines and due to meteorological conditions in the winter, snowmobiles do at times leave a visible haze in the park, particularly in the Kawuneeche Valley. Visibility impacts were discussed on page 60 and 61 of the EA. Implementing the preferred alternative will improve visibility throughout most of the Kawuneeche Valley. There will continue to be air quality impacts along the two-mile section of the North Supply Access Trail that will be monitored as discussed in the monitoring plan. We do not consider any impacts occurring along the North Supply Access Trail to be a significant adverse impact.

30. *The NPS is encouraged to focus on protecting human health and not depend on changes in OHV technologies.*

Snowmobile technology and the snowmobile market have been evolving slowly. A review of the models offered by the Big Four snowmobile manufactures (Arctic Cat, Polaris, Yamaha and Ski-Doo) revealed that of the 86 models offered for 2003, only 5 models are powered by cleaner burning 4-stroke engines. By implementing the preferred alternative, snowmobile use will be limited to the North Supply Access Trail and there will be no snowmobile access to the interior of the park. Air quality within the park interior is expected to improve as a result.

31. *Should include the total number of motorized users on the section of Trail Ridge Road not closed to snowmobiles.*

From November 2000 through April 2001 a total of 7,227 automobiles entered the park through the Grand Lake Entrance. On average, there are 1.45 visitors per snowmobile, and 2.5 visitors per car. The total number of visitors who arrived by snowmobile is estimated at 5,800, and the total number of visitors who arrived by car is estimated at 18,068.

32. *There should be more restrictions on Shadow Mountain Lake.*

Shadow Mountain Lake is within the Arapaho National Recreation Area and is managed by the Sulfur Ranger District Office in Granby and not by RMNP. We have no authority to enforce regulations on the lake.

33. *Lake Granby may experience more snowmobile use if the North Supply Access Trail is closed.*

The North Supply Access Trail will not be closed.

34. *The draft EA states the preferred alternative presents minor air quality impacts compared to Alternative 2 and 3. How can this be when 85% of snowmobiles use the North Supply Access Trail?*

The statement in the EA is in reference to impacts 16 miles into the interior of the park. The preferred alternative confines impacts to only a small corner of the park while improving air quality in most of the Kawuneeche Valley and most importantly from the Timber Lake Trailhead parking lot to Milner Pass. The six-mile section of Trail Ridge Road above the Timber Lake Trailhead parking lot has been open to snowmobiles during the winter. With implementation of the preferred alternative, it will be closed to all mechanized vehicles during the winter. Air quality will improve in the interior of the park, but may slightly deteriorate along the North Supply Access Trail due to an increase in snowmobile use. However, these air quality impacts are confined to a small portion of the park, and they are expected to be minor. The extent of air quality impacts along the North Supply Access Trail will be determined by monitoring.

35. *Allowing access on the North Supply Access Trail leads to a de facto sacrifice area.*

We do not consider the North Supply Access Trail as a “sacrifice area” for snowmobiles. Most of it is a road used by motor vehicles throughout the year. The first 0.87-mile (1.4 km) of the trail is a utility corridor open to authorized vehicles during other times of the year and only open

to snowmobiles during the winter. The utility corridor is a disturbed area that has buried electric, sewer, gas, phone and TV cable lines. The remaining 1.13-mile (1.8-km) follows the Sun Valley Road that is open to vehicles throughout the year. The North Supply Access Trail is less than one mile from the park boundary and is located near several subdivisions, including one NPS housing area.

*36. Reopening the Summerland Park and Bowen Gulch Trails would spread the impact of noise and road congestion.*

While reopening these two routes would disperse snowmobile use to other areas in the park, we do not believe it would make a significant difference in use patterns, and the impacts do not warrant reopening these two routes. The Bowen Gulch Access Route was closed to snowmobiles when Congress designated the Bowen and Baker Gulch areas as part of the Never Summer Wilderness in the Arapaho National Forest. The Arapaho National Forest is opposed to reopening this route because of potential impacts to the wilderness area. The Summerland Park Snowmobile Trail was closed to the public because of off-road violations and incidents of trespass onto private land. Private landowners in Summerland Park are allowed to access their property by snowmobile on the Summerland Park Trail if they choose to do so during the winter, and can access their property by 4-wheel drive during other times of the year.

*37. Snowmobiles are a terrible impact on the “soundscape.”*

The preferred alternative eliminates snowmobile noise from over 99% of the park. Snowmobile noise will be eliminated from most of the Kawuneeche Valley, and in particular from the Timber Lake Trailhead parking area to Milner Pass where Trail Ridge Road will revert to a backcountry trail during the winter. The impact on the natural soundscape in the North Supply Access trail area is not considered significant, but will be monitored in the future.

*38. The preferred alternative does not seem unreasonable, however position remains that snowmobiling is both inappropriate and illegal in a national park.*

The use of snowmobiles, when allowed in national parks consistent with applicable statutes, regulations, and executive orders is not illegal. The enabling legislation for RMNP addresses recreational use and protection of natural resources and scenery. Our preferred alternative balances visitor use and resource protection, while avoiding the impairment of park resources and values. Additionally, the use of snowmobiles along the North Supply Access Trail is consistent with the park’s enabling legislation, Final Master Plan, and park management objectives.

*39. Concern that the Preferred Alternative will lead to further degradation of public lands.*

The preferred alternative will eliminate snowmobile impacts 16 miles into the interior of RMNP and eliminate impacts to recommended wilderness from the Timber Lake Trailhead to Milner Pass. Shifting more snowmobiles to the Stillwater Trail System (maximum increase of 9 percent) could have some potential minor indirect and cumulative impacts on natural resources on the Arapaho National Forest.

*40. Specific data should indicate the magnitude, quality, duration, variability and distance carried of snowmobile noise.*

Data specific to RMNP does not exist, but does exist for Yellowstone National Park. Studies done in Yellowstone National Park determined that snowmobiles could be heard two to three miles away from road corridors, but during the summer, automobiles were usually not heard any further than one mile. Noise monitoring will be done along the North Supply Access Trail, and could be started as early as the 2003 – 2004 winter season.

41. *Failed to mention that a major consequence of recreation in and around lynx habitat is snow compaction and how it enables competing carnivores to access the high country. Lynx are potentially affected by snow-based recreational activities and it is not substantiated in the EA.*

RMNP is considered a high elevation park. The lowest elevation west of the Continental Divide is about 8,600 ft. (2,600 m.). We consider any elevation above 9,000 feet (2,700 m.) potential lynx habitat in the Colorado River District. The North Supply Access Trail is below 9,000 ft., less than one mile from the park boundary, and less than one mile from year round residents, which include subdivisions. This portion of the park is not lynx habitat.

Because the lynx has been extirpated from RMNP, there is only *potential* lynx habitat in the park and on USFS lands around the park. We hope to reintroduce the lynx into the park in the future to establish a resident population. The preferred alternative will be a benefit to potential lynx habitat by permanently closing Trail Ridge Road, the Summerland Park Snowmobile Trail, and the Bowen Gulch Access Route to snowmobiles. These trails enter or provide access into some of the best potential lynx habitat in the park. Snowmobiles will also be eliminated from most of the Kawuneeche Valley, which is considered potential lynx habitat.

Snow compaction that benefits certain carnivores is not a significant concern in RMNP. RMNP does not have wolves or grizzly bears. We have observed predators such as mountain lions and coyotes following cross-country ski, snowshoe, and snowmobile trails. If lynx are ever reintroduced into RMNP, the superintendent does have the authority to restrict access to certain sensitive areas if deemed necessary (i.e., to protect a den). A restriction, if needed, would include all recreation users, not just motorized ones.

42. *Expand on the statement that winter recreation can affect wildlife by discussing research concluding this and why it can be extrapolated to RMNP. EA cites wildlife studies but does not explain results or why they are pertinent.*

The service-wide regulations on snowmobiles prohibit their use in national parks if such use disturbs wildlife. Yellowstone National Park and land managers in the Greater Yellowstone Area (GYA) have been the leaders in addressing the issue of winter recreation impacts on wildlife. While much of the information developed by those land managers is pertinent to RMNP, some of it does focus on issues unique to the GYA (e.g. impacts to bison). Increasing winter recreation use in RMNP has the potential to impact wildlife and their habitat, but those impacts are not clearly understood. Results from the research cited in the EA (including Tom Olliff's et al. literature review and assessment on effects of winter recreation on wildlife) determined that behavioral and physiological responses to harassment in the form of noise or certain types of human presence can shift an animal's energy balance so that more energy is expended than is taken in, which results in decreased survival or reproduction success. In RMNP, park visitors driving snowmobiles have been observed chasing and harassing moose.

Implementing our preferred alternative will eliminate snowmobile noise and other snowmobile impacts from over 99% of the park.

43. *Insist that NPS conduct water quality assessments before arriving at a final decision to keep the North Supply Access Trail open.*

Water quality sampling was conducted along the North Supply Access Trail in 2000 and results noted some impacts with a recommendation for further monitoring. The decision to implement Alternative 1 was partially based on results from the work done by Mark VanMouwerik in 2000. On page 52 of the EA we state that if new data reveals that significant adverse impacts are occurring, the park will reevaluate snowmobile use. A monitoring plan with impact thresholds is included in the FONSI on Page 6. If thresholds are exceeded, it will trigger management actions that will correct the problem.

44. *EA states Alternative 2 has a higher risk to impacts to aquatic and riparian areas than the preferred alternative but this is not supported.*

We disagree. We believe the risk to aquatic and riparian areas in the EA was adequately addressed. Trail Ridge Road passes through Kawuneeche Valley for ten-miles and passes over six tributary streams that flow into the North Fork of the Colorado River. The Kawuneeche Valley is the largest wetland valley in the park. Based on research cited in the EA, there is a higher risk to aquatic and riparian areas in the Kawuneeche Valley from snowmobile pollution than along the North Supply Access Trail. The North Supply Access Trail passes over only one tributary stream and the North Fork of the Colorado River and does not pass through or adjacent to extensive aquatic and riparian areas like Trail Ridge Road does through the Kawuneeche Valley. Monitoring by VanMouwerik in 2000 found no impacts to the North Fork of the Colorado River from snowmobile use on the North Supply Access Trail.

45. *It's possible that at least some of the PAH contaminants are from automobile emissions – should do a study on section of trail used solely by snowmobiles.*

We agree. Further studies will be possible when Trail Ridge Road is closed to snowmobiles, which is anticipated to occur during the 2003-2004 winter season. The first 0.87-mi. section of the North Supply Access Trail will only be open to snowmobiles. Starting in 2003-2004, monitoring will provide the opportunity to sample two areas: one road that is open only to automobiles and one trail that is open only to snowmobiles.

46. *To what extent does recreational activity (specifically snowmobile and automobile traffic) have an adverse/negative impact on the intangible qualities of natural quiet, solitude, space and scenery?*

Work conducted in Yellowstone National Park indicates that during the winter snowmobiles can be heard as far as two to three miles from road corridors. During the summer, automobiles usually can be heard no more than one mile away. Studies have demonstrated that snowmobiles can be noisier than automobiles. The natural soundscape, particularly above the Timber Lake Trailhead parking area to Milner Pass, will benefit from implementation of the preferred alternative because this portion of Trail Ridge Road would be closed to all mechanized vehicles. During the winter months when Trail Ridge Road is closed above the Timber Lake Trailhead parking area, natural sounds will dominate the landscape. Because automobiles and

snowmobiles are confined to road corridors, impacts to the natural soundscape, solitude, space and scenery only occur in a very small portion of the park. About 95% of the park is recommended or potential wilderness, and much of that is very remote and has little visitation even during the busy summer months. Throughout most of the park there are ample opportunities for visitors to experience pristine natural sounds, solitude, space and scenery during the winter.

*47. If Kawuneeche Valley becomes designated wilderness instead of recommended, this will have an impact on all forms of travel and recreation summer and winter.*

To avoid compromising future wilderness designation, all recommended and potential wilderness areas within RMNP are being managed as though they were designated wilderness. Management actions within recommended or potential wilderness areas are guided by the recently approved Backcountry/Wilderness Management Plan (2001). If the recommended wilderness portions of the Kawuneeche Valley become designated, there would be no change from the way the area is currently being managed. A small portion of Kawuneeche Valley is not within recommended wilderness. These areas include the Trail Ridge Road corridor and the North Supply Access Trail.

*48. Disappointed that no outdoor recreation specialist was consulted for the project [development of the EA]*

RMNP does not have an Outdoor Recreation Specialist on staff. However, numerous individuals with some outdoor recreation expertise were consulted during the preparation of the EA. These included personnel from the Arapaho National Forest, businesses in Grand Lake, and the Grand Lake Trustees. Park staff that were consulted included park rangers with experience in outdoor recreation management, and our Wilderness Program Specialist, who has extensive training and expertise in outdoor recreation. Additionally, the public comment period provided opportunities for professional outdoor recreational specialists to provide input.

*49. Develop comprehensive Winter Recreation Management Plan based on full public input.*

There are several plans already approved, or that will shortly be approved, that address winter recreation to some extent. All have or will be open to public input. The park recently approved the Backcountry/Wilderness Management Plan (2001) which went through extensive public review. A Commercial Use Management Plan will be developed in the future, and a park-wide transportation plan is also being developed. A Final Master Plan, a Resources Management Plan and Statement for Management are currently in use. All management plans went through extensive public review and are consistent with the park's enabling legislation. Based on the management plans already approved, or being contemplated, a comprehensive winter recreation plan is presently not necessary.

*50. Issue of restricting all snowmobile access (selecting Alternative 4) should be revisited in the next 2-5 years.*

We will continue to monitor snowmobile use and any associated impacts to water, soil, air and the natural soundscape along the North Supply Access Trail when Alternative 1 is implemented.

As previously stated, if monitoring reveals significant adverse impacts are occurring from snowmobiles, the park will reevaluate this use. The NPS is required to determine if snowmobile use is consistent with the service-wide regulation found in 36 CFR 2.18 (promulgated in 1983), as well as the Executive Orders 11644 (promulgated in 1972) and 11989 (promulgated in 1977). The regulation and the executive orders prohibit snowmobiles except when their use is consistent with the park's natural, cultural, scenic and aesthetic values, safety considerations, park management objectives, and will not disturb wildlife or damage park resources.

*51. Why not allow snowmobiles to use the plowed portion of Trail Ridge Road from the Kawuneeche Visitor Center to Timber Lake Trailhead Parking Lot?*

As disclosed in the EA, snowmobiles are noisier and generate more pollution than a comparable number of automobiles. There will be benefits to air quality and natural sound in the Kawuneeche Valley if the road is closed to snowmobiles as proposed in 2002-2003. The exposure of the Kawuneeche Valley's open meadows encourages off-road violations and there are safety concerns when snowmobiles share the road with automobiles. Closing Trail Ridge Road to snowmobiles will reduce the risk to human safety and will reduce adverse environmental impacts. Visitors driving snowmobiles along Trail Ridge Road have been observed chasing and harassing moose, and illegal off-road travel has damaged vegetation. Trail Ridge Road will continue to be open to automobiles from the park boundary to the Timber Lake Trailhead parking lot during the winter.

*52. County Road 4 and Idleglen parking lot are always full and very dangerous.*

We agree there is a parking problem along County Road 4 and in the Idleglen parking area, particularly during winter weekends. Leaving the North Supply Access Trail open will not exacerbate the parking problem that already exists at the Idleglen parking lot. The Arapaho National Forest is planning to expand the Idleglen parking lot to accommodate present use. However, the planned expansion would not accommodate a large increase in users, which would occur if the North Supply Access Trail was closed. Potential impacts to County Road 4 and the Idleglen parking lot were considered in the development and implementation of our preferred alternative, and were analyzed as part of Alternative 4.

*53. Page 52 paragraph four states that under Alternative 2 a high risk of impacts to aquatic and riparian resources exists from snowmobile use but is not supported and seems to contradict paragraphs one and two.*

The paragraphs in question discuss the small water and soil sample sizes that were collected from the North Supply Access Trail in the spring of 2000. The EA goes on to state that further sampling is needed before the conclusion can be drawn that snowmobiles are impacting aquatic and riparian resources along the trail. Further sampling is proposed along the North Supply Access Trail, starting as early as the 2003 – 2004 winter season. Paragraph four also discusses concerns about Trail Ridge Road and its proximity to numerous aquatic and riparian resources in

the Kawuneeche Valley. There is a greater potential for snowmobiles to impact sensitive aquatic resources along Trail Ridge Road than along the North Supply Access Trail.

*54. Page 55 paragraph one, last sentence -- appears to contradict with statements on page 52 that generally discount water impacts from snowmobile use.*

The referenced language addresses two separate areas of the park. There is a lower risk to fisheries from snowmobile use along the North Supply Access Trail than along Trail Ridge Road. Trail Ridge Road passes through the Kawuneeche Valley for ten miles and crosses six important tributary streams that support fish populations and flow directly into the North Fork of the Colorado River. The North Supply Access Trail crosses one tributary stream, an irrigation ditch, and the North Fork of the Colorado River. No water quality impacts were noted in the Colorado River when water samples were collected in the spring of 2000.

*55. The EA should clearly state the ecological and social justification as to why the preferred alternative does not permit snowmobiles to travel the plowed 10-miles on Trail Ridge Road.*

The two executive orders directing this decision appear to presume no snowmobile use will occur in national parks unless the use is either specifically required by statute or the adverse environmental consequences of the use are minimal or nonexistent. According to the NPS policy on the use of off-road vehicles (including snowmobiles) implementing these two executives orders, NPS may allow recreational snowmobile use in a park if there will be no adverse impacts on the park's natural, cultural, scenic, and aesthetic values. Additionally, if such use has been allowed consistent with the foregoing standard, NPS must immediately close designated snowmobile routes when the use is causing or will cause unacceptable adverse effects on the soil, vegetation, wildlife, wildlife habitat, or cultural or historic resources. The NPS regulation on snowmobile use (36 CFR 2.18) is consistent with the direction provided by the executive order.

We believe the EA does clearly state the reasons why we preferred Alternative 1 over the other alternatives. Snowmobiles are noisier and generate more pollution than automobiles. The 10-mile portion of Trail Ridge Road that is currently open to snowmobiles and automobiles passes through the largest riparian valley in the park. The potential for impacts to aquatic and wetland habitat is higher along Trail Ridge Road than along the North Supply Access Trail. We believe Alternative 1 strikes the best balance between the various forms of winter recreation and the preservation and protection of our natural resources. On page 30 of the EA we state the following:

*“At least 75% of visitors who visit the Colorado River District do not enter by snowmobile. They seek other types of recreation or forms of recreation such as sightseeing, skiing or snowshoeing. Most visitors (82%) consider tranquility an extremely important feature of the park.”*

Snowmobile noise can be heard two to three miles from a road, which adversely affects visitors skiing or snowshoeing in the Kawuneeche Valley. Closing the road to snowmobiles will restore tranquility to a large portion of the valley, which will benefit other recreational users.

56. *Page eight, third paragraph should include exceptions identified by April 26, 2000 memo (see page 20 of EA)*

Those exceptions were noted in the Executive Summary and again on page 10, so we see no need to include the exceptions on page 8.

57. *Page 20, the third exception in the April 26, 2000 memo suggests that because Trail Ridge Road is a Colorado State Highway (Highway 34) – it would fall under this exception.*

State or county highway maintenance departments do not maintain Trail Ridge Road. Highway 34 within the boundaries of Rocky Mountain National Park is maintained by the NPS, and since it is within a national park it is part of the Federal Highway Transportation System, not the Colorado Department of Transportation System. However, we did notice that that the word “county” in the third exception is wrongly spelled as “country”. We corrected the spelling in the final EA.

58. *Page 21, after the fourth paragraph, describe for clarity the differences in the EA conducted in 1980 and this current EA draft in 2000.*

The differences in the two EAs were clarified on page 21. The Committee Report (H.R. 95-1460) accompanying P.L. 95-450 in 1978 asked the NPS to address the possibility of a new snowmobile route, which required the preparation of an EA to evaluate potential environmental impacts. In 2000, the Department of the Interior Assistant Secretary for Fish and Wildlife and Parks directed the NPS to take a fresh look at snowmobile use and determine if snowmobile use is consistent with 36 CFR 2.18 and Executive Orders 11644 and 11989. This action also required an EA. Since the Bowen Gulch Access Route and the Summerland Park Snowmobile Trail were included in the 1980 EA, and administratively closed before the 2000 EA was developed, we decided to address the environmental impacts from opening or permanently closing these two trails in the 2000 EA. A possible new snowmobile route along the East Shore of Shadow Mountain Lake was addressed in the 1980 EA, but rejected. As explained in the 2000 EA, the NPS chose not to reevaluate the opening of that trail because of impacts to bald eagle habitat.

59. *Page 21, the last sentence of paragraph five should read: “This EA also addresses permanently closing Trail Ridge Road and permanently closing the North Supply Access Trail.”*

The sentence was changed in the EA.

60. *Page 23, last sentence to top of page 24. Using these figures, it appears that only 13% travel by snowmobile and 87% by automobile.*

The number 28,768 refers to total number of visitors, not vehicles, that passed through the Grand Lake entrance, and 3,796 is the total number of snowmobiles, so the two are not comparable. A total of 28,417 snowmobiles entered the park in 1999 - 2000 and 3,796 of those (13%) used Trail Ridge Road. On average 4,690 snowmobiles drive on Trail Ridge Road, and on average there are 1.45 visitors per snowmobile. The total number of visitors riding on 3,796 snowmobiles would be 5,504.

61. *Make clear that the 1994/1995 visitor use survey was not designed to gather impacts of snowmobiles and probably should be excluded entirely.*

We changed the wording in the EA to clarify that the survey was not designed to specifically ask visitors about snowmobiles. We do believe the information from the survey is pertinent to snowmobile use and the reference to the survey should remain in the EA. Visitors were asked what their main winter activity was, and some stated snowmobiling. The survey results have assisted park managers to evaluate and improve park operations, and the results have been used in other management plans, including the recently approved Backcountry/Wilderness Management Plan. More visitor surveys have been conducted since 1994/1995, and more are planned for the future.

62. *Page 30 last paragraph these noise studies need to document actual decibel readings: distance from snowmobile route, time of day, days per year, etc. Not appropriate to compare noise from snowmobiles in Yellowstone to RMNP.*

We believe it is appropriate to reference noise impacts from snowmobiles in Yellowstone. Both are national parks, both are managed using the same NPS regulations and policies, and both have similar habitats. However, we agree that decibel readings from snowmobiles should be taken in RMNP. Noise monitoring is included in the monitoring plan that appears on page 6 of the FONSI.

63. *Has the CDOW and USFWS identified RMNP as potential lynx habitat?*

Yes the CDOW and USFWS do have maps showing a large part of RMNP as potential lynx habitat. As previously discussed, the North Supply Access Trail is outside potential lynx habitat.

64. *Page 48 first paragraph -- apply same standard to Alternative 2.*

The wording in the last sentence was changed to include Alternative 2.

65. *Page 58 last paragraph, recent studies indicate that many species are more stressed by hikers and cross-country skiers.*

The wording in the last sentence of the last paragraph on page 58 has been changed to reflect the impact snowshoe hikers and cross-country skiers could cause to wildlife.

66. *Page 64 first paragraph, section 4.2.2 – if Alternative 1 is implemented, quality snowmobile routes will cease to exist in RMNP.*

We agree that Trail Ridge Road is a scenic road and offers unsurpassed views of mountains and a high elevation wetland valley. Trail Ridge Road will be closed to snowmobiles when Alternative 1 is implemented, and that experience by snowmobile will be lost. However, the experience will still exist for visitors driving in automobiles and for those visitors who cross-country ski or snowshoe. Visitors will not lose the opportunity to view the park along the ten-mile segment of Trail Ridge Road. The North Supply Access Trail will remain open to snowmobiles and will provide access to several miles of quality snowmobile trails and scenic vistas in the Stillwater Trail System.

67. *The ten-miles of Trail Ridge Road open to automobiles should remain open to snowmobiles.*

Please refer to response #51.

68. *Specific data should indicate the magnitude, quality, duration, variability and distance carried of snowmobile noise. Document impacts of snowmobiles on wildlife.*

We presently do not have specific snowmobile noise data in RMNP, but will be monitoring noise as early as the 2003-2004 winter season. Based on data collected in Yellowstone National Park, snowmobile noise during the winter can sometimes be heard two to three miles from a road. Automobiles during the summer are usually not heard more than a mile from a road. As previously stated in response #46, studies have documented that, on average, snowmobiles are noisier than automobiles. Snowmobile riders have been observed chasing and harassing moose along Trail Ridge Road. There have been documented wildlife impacts in Yellowstone National Park from the use of snowmobiles. We consider those impacts pertinent to RMNP. There is a greater potential for disturbing wildlife when snowmobiles drive 16 miles into the interior of the park verses passing through a small portion of the park along the two-mile North Supply Access Trail.

69. *Section 1.2 of the EA – include a discussion of the Clean Air Act that explains the significance of Class I air quality.*

The Clean Air Act and its significance to RMNP was added to Section 1.2

70. *Section 3.1.8. Air Quality, paragraph 2 – research related to exotic plant invasion and nitrogen deposition is speculative, suggest deleting this paragraph.*

The paragraph was deleted.

71. *Section 3.1.8. Air quality – Suggest revising this paragraph based on recent information presented by Doug Burns of USGS.*

The paragraph was revised.

72. *Section 3.1.8 Air quality, paragraph 3 – A clarification – visibility is probably impaired 100% of the time, but it is noticeable only 90% of the time. Although true that most visibility impairment is probably due to sources outside the park, there is no data that link pollutants to sources.*

So noted in the EA.

73. *Please quantify the potential emission changes associated with diverting snowmobiles from Trail Ridge Road to the North Supply Access Trail.*

When Trail Ridge Road is closed to snowmobiles, the worst case scenario would be about 3,796 more snowmobiles diverted to the North Supply Access Trail based on 1999 - 2000 statistics. A Polaris 488-cc or an Arctic Cat 440-cc snowmobile produces between 140 grams and 290 grams of PAH per hour, 2.75 grams of sulfur dioxide and 3.2 grams of ammonia. The total amount of pollutants produced from 3,796 snowmobiles of similar size if they use the trail for 15 minutes

could therefore be 133 kg. to 275 kg. ( 293 lb. to 606 lb.) of PAH, 2.6 kg. (5.7 lb.) of sulfur dioxide, and 3 kg.(6.6 lb.) of ammonia.

Snowmobile air pollution along the North Supply Access Trail will occur from late November to mid-March each year. Air pollution could cause a cumulative impact in the long-term depending on how long those pollutants remain in the soil. We are currently developing a monitoring plan and propose to conduct long-term monitoring of water (snowpack), and air quality (public health) along the North Supply Access Trail. If significant adverse impacts are noted when we initiate the monitoring plan, snowmobile use must be managed to reduce the impact to below the identified threshold level.

74. *Section 4.1.7. Impact on Air Quality, paragraph 5 – Change the last sentence to read “Alternative 1 should result in improvements to air quality along Trail Ridge Road in RMNP. Diverting snowmobiles along the North Supply Access Trail will probably degrade air quality along that trail.”*

Sentence was changed and a new one was added. There will be an overall benefit to air quality in the Colorado River District in RMNP when snowmobiles are removed from Trail Ridge Road. Once the Final Rule is approved, snowmobiles will be confined to a small portion of the park and will only pass through RMNP along the two-mile access trail. This change could occur as early as the 2003 – 2004 winter season. We agree that there will a degradation of air quality along the North Supply Access Trail from increased snowmobile use when Trail Ridge Road is closed, but we do not believe the increase will be a significant adverse impact. We will continue to monitor, soil, water, air quality and noise along the North Supply Access Trail. As previously stated, if a threshold is exceeded, the park will initiate management actions to reduce or eliminate the impact.

75. *Recommend that in addition to water and sediment sampling that the park monitor ambient air quality to 1) ensure that snowmobile use is not causing exceedances of the NAAQS, and 2) determine if air quality in the Kawuneeche Valley improves when Trail Ridge Road is closed to snowmobile use.*

In our monitoring plan we are proposing to monitor only carbon monoxide and particulate matter.

76. *Alternative 2 is more appropriate as industry creates cleaner technology.*

Snowmobile technology and the snowmobile market have been evolving slowly. A review of the models offered by the Big Four snowmobile manufactures (Arctic Cat, Polaris, Yamaha and Ski-Doo) revealed that of the 86 models offered for 2003, only 5 models are powered by cleaner burning 4-stroke engines. Given the current situation, we believe that Alternative 1 is the best choice.

77. Page 59 – Congress stated that activities, sights and sounds that occur outside wilderness boundaries do not affect an area’s wilderness suitability. Therefore snowmobile noise outside any wilderness is incapable of degrading the experiences of users of recommended wilderness in the park, therefore issues related to potential wilderness designation are irrelevant and should be deleted from the EA.

We disagree. As stated in the park’s recently approved Backcountry/Wilderness Management Plan and EA:

*“The NPS strives to preserve the natural quiet, the natural sounds, and the natural light associated with the physical and biological resources of the park. Activities causing excessive or unnecessary unnatural sound in and adjacent to parks are monitored, and actions are taken to prevent or minimize unnatural sounds that adversely affect park resource or values or visitors’ enjoyment of them.”*

This quote was taken from NPS-77, Natural Resources Guidelines (2000). The 1976 Master Plan for RMNP recognizes humans, where present, as part of the park ecosystem, but the major emphasis is on the perpetuation of natural processes. If unacceptable impacts occur to park resources (i.e., human-caused noise) from recreational activities in the park’s backcountry/wilderness, the park will take the steps that are needed to correct the problem.

Noise from snowmobiles, even though occurring adjacent to backcountry/wilderness, is adversely affecting the natural soundscape and solitude well into backcountry/wilderness, and to a greater degree than automobiles or other forms of recreation. We believe that mitigation to minimize those impacts is warranted. Closing Trail Ridge Road to snowmobiles will eliminate snowmobile noise impacts 16 miles into the interior of the park and will benefit recommended and designated wilderness. Implementing Alternative 1 strikes a balance between preservation and providing for recreational uses.

78. Page 12 paragraph 2 –replace the sentence stating “In addition, transporting snowmobiles ...not permitted in USFS with the following: “Currently rental companies cannot trailer snowmobiles to or stage snowmobiles from the Idleglen Trailhead Parking area. This activity would require a commercial outfitter/guide special use permit. Idleglen Trailhead is currently filled to capacity during peak use periods with non-commercial users. To accommodate any commercial use from Idleglen Trailhead, additional parking capacity would need to be built, as well as a determination of total user capacity in the entire trail system. Presently, the USFS believes that the off-site commercial snowmobile rentals vs. the on-site non-commercial public parking at Idleglen Trailhead is an adequate mix of accommodation, and thus a prospectus to allocate commercial use of the facility is not planned in the near future.”

So changed on page 12 in the EA and also changed on page 25.